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*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

**SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the lead case,  
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**SECOND STIPULATION CONTINUING  
HEARING AND EXTENDING TIME FOR  
REORGANIZED DEBTORS TO  
RESPOND TO MOWBRAY'S MOTION  
FOR LEAVE TO FILE AMENDED  
PROOF OF CLAIM**

[Related to Dkt. No. 9392]

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is  
2 entered into by PG&E Corporation and Pacific Gas and Electric Company (collectively, the  
3 “**Debtors**” or “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter**  
4 **11 Cases**”), and The Original Mowbray’s Tree Service, Inc. (“**Mowbray’s**”). The Reorganized  
5 Debtors and Mowbray’s are referred to in this Stipulation and Agreement for Order collectively  
6 as the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as follows:

7 **RECITALS**

8 A. On November 3, 2020, Mowbray’s filed a *Motion for Leave to File Amended*  
9 *Proof of Claim* [Dkt. No. 9392] (the “**Motion**”).

10 B. On November 30, 2020, the Bankruptcy Court entered an *Order Granting*  
11 *Stipulation Continuing Hearing and Extending Reorganized Debtors’ Time to Respond to*  
12 *Mowbray’s Motion for Leave to File Amended Proof of Claim* [Dkt. No. 9633], continuing the  
13 hearing on the Motion to January 12, 2021 (the “**Hearing**”), allowing the Reorganized Debtors  
14 until December 18, 2020, to file and serve any opposition or response to the Motion, and  
15 allowing Mowbray’s until January 7, 2021 to file any reply to the opposition or response.

16 C. As they discuss a potential negotiated resolution of the matters presented by the  
17 Motion, counsel for the Reorganized Debtors and counsel for Mowbray’s have agreed to a  
18 further modified briefing schedule for the Motion, and respectfully request that the Hearing be  
19 further continued to accommodate this new proposed briefing schedule.

20 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**  
21 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**  
22 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**  
**UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**  
**THAT:**

23 1. The time for the Reorganized Debtors to file and serve any opposition or response  
24 to the Motion is extended to January 8, 2021.

25 2. The time for Mowbray’s to file any reply to the opposition or response is extended  
26 to January 28, 2021.

27 3. The Hearing is continued to February 9, 2021 at 10:00 a.m. (Pacific Time).  
28

1           4.       This Stipulation shall constitute the entire agreement and understanding of the  
2 parties relating to the subject matter hereof and shall supersede all prior agreements and  
3 understandings relating to the subject matter hereof.

4           5.       This Stipulation may be executed in counterparts, each of which shall be deemed  
5 an original but all of which together shall constitute one and the same agreement.

6           6.       The Bankruptcy Court shall retain jurisdiction to resolve any disputes or  
7 controversies arising from this Stipulation.

8       Dated: December 18, 2020

          Dated: December 18, 2020

9       WEIL, GOTSHAL & MANGES LLP  
10      KELLER BENVENUTTI KIM LLP

          SHEPPARD, MULLIN, RICHTER &  
          HAMPTON LLP

11      /s/ Thomas B. Rupp  
12      Thomas B. Rupp

/s/ Ori Katz  
          Ori Katz

13      Attorneys for Debtors  
14      and Reorganized Debtors

          Attorneys for The Original Mowbray's  
          Tree Service, Inc.